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Counsel for Ms. Moran

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE LARRY A. BURNS)

UNITED STATES OF AMERICA, Plaintiff, v. BLANCA ESTELA MORAN, Defendant.	CASE NO. 07CR3116-LAB DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO SHORTEN TIME

I, Jodi D. Thorp, hereby declare as follows:

1. I was appointed to represent Ms. Moran in the above-captioned case.
2. In Ms. Moran's case, the probation officer recommended a 9 level increase for substantial risk of death or bodily injury.
3. In order to properly address the issue, defense counsel needed more than the traditionally allocated 14 days to respond.
4. Defense counsel and an investigator viewed the car in question.
5. Defense counsel completed significant research with respect to case law and the facts of Ms. Moran's case.

6. Defense counsel requested a declaration from Investigator Leano with respect to his work done on the case and his conclusions.

7. The investigator needed additional time to research the type of car and reach his conclusions.

8. The investigator is an employee of federal defenders with a high case load.

9. The investigator was in trial during this time period.

10. I received the declaration of Jose Leano past the date the objections were due.

11. The declaration was an integral part of Ms. Moran's argument.

12. I was also preparing for trial and handling other cases.

13. I am aware that Ms. Moran could have sought a continuance of the sentencing hearing from this Court.

14. I did not request a continuance in this case because should the Court adopt the parties' recommendations regarding sentencing, Ms. Moran would receive a time served sentence.

I swear that, to the best of my knowledge and memory, the foregoing is true and correct.

Dated: February 21, 2008

/s/ *Jodi D. Thorp*
Jodi D. Thorp